

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	CR. NO. 2:05-cr-294-MEF
	)	
JENNIFER VANHUNNIK	)	

MOTION FOR DOWNWARD DEPARTURE

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and pursuant to the United States Sentencing Commission, Guidelines Manual, Section 5k1.1, respectfully requests this Honorable Court to downwardly depart four (4) levels, in the sentence that would otherwise be imposed on Defendant Jennifer Vanhunnik, and as reasons therefore, submits the following:

1. The United States herein states that the Defendant has provided substantial assistance in investigations of federal narcotics law violations in the Middle District of Alabama.
2. The United States submits that it will consider a further motion for downward departure pursuant to Federal Rules of Procedure, Rule 35, should the Defendant continue to cooperate with federal agents and the United States, and be ready, willing and able to testify in trials of the violators of federal law.

Wherefore, premises considered, the United States moves this Honorable Court for a downward departure from the calculated guideline range. This motion seeks a departure of four (4) levels.

Respectfully submitted this the 28th day of November, 2007.

LEURA G. CANARY  
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CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:  
  
Roianne Conner.

Respectfully submitted,

LEURA G. CANARY  
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